



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

JAMES E. JOHNSON  
*Corporation Counsel*

JOSEPH ZANGRILLI  
*Senior Counsel*  
Phone: (212) 356-2657  
Fax: (212) 356-3509  
jzangril@law.nyc.gov

April 20, 2020

**BY ECF:**

Hon. Alison J. Nathan, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Thomas Medina v. City of New York, et al.,  
19 Civ. 9412 (AJN)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, attorney for defendants the City of New York, Commissioner James O'Neill, Chief of Department Terrance Monahan, Sergeant Hekmatullah Mukhtarzada, Police Officer Shanee Hansler, Police Officer David Callan, Captain William Gallagher, Sergeant. Jose A. Gomez, Police Officer Nay Htoo, and Police Officer Christopher Siciliano ("City defendants") in the above-referenced matter. City defendants write to respectfully request the Court set the deadline for defendants to file their reply to the pending partial motion to dismiss until May 5, 2020.<sup>1</sup> (*See*, Dkt. Nos. 59, 84) City defendants also respectfully request leave of the Court to file one 15 page memorandum of law, consolidating City defendants' reply to the partial motion to dismiss and to plaintiff's motion for Rule 11 sanctions. (*See*, Dkt. Nos. 59, 62, 84). Counsel for plaintiff, Alexander Lesman, Esq., consents to these requests.

As the COVID-19 medical emergency continues, counsel for the defendants continue to operate in a work from home capacity. As a result, this has caused a hindrance in counsels' ability to timely prepare and draft documents. In addition, defendants are now dealing with a number of unanticipated conflicts following plaintiff's receipt of an extension of time to file his opposition to the pending partial motion to dismiss. Since plaintiff was already granted leave to file consolidated briefs, defendants believe filing a consolidated reply will increase efficiency and is in the interest of judicial economy.

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<sup>1</sup> Counsel for defendant Nunez, James Moschella, Esq. joins in this request.

Accordingly, defendants respectfully request that the Court set May 5, 2020, as the deadline for all defendants to file the reply to the pending partial motion to dismiss and to grant leave to City defendants to file one 15 page reply memorandum of law in response to the pending partial motion to dismiss and to plaintiff's motion for Rule 11 sanctions.

Thank you for your consideration of this matter.

Respectfully submitted,



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Joseph Zangrilli

Senior Counsel

cc: All counsel of record via ECF